

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

DONNA L. THOMPSON, ESQ. (DLT-0931)

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Attorney for Secured Creditor,
Automotive Finance Corporation

IN RE:

BAV AUTO, L.L.C.

a/k/a COSTA'S AUTO GALLERY

CASE NO. 22-17933- JKS

HON. JOHN K. SHERWOOD, USBJ

HEARING DATE: 12/6/2022

CHAPTER # 11

**NOTICE OF MOTION FOR ENTRY OF AN ORDER GRANTING
RELIEF FROM AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362(d)**

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Kearny, NJ 07032

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Trustee
Mark Politan
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88 East Main Street
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Mendham, NJ 07945

Peter J. D'Auria
Office of the U.S. Trustee
One Newark Center
Suite 2100
Newark, NJ 07102

PLEASE TAKE NOTICE that on **December 6, 2022, at 10:00 a.m.**, or as soon thereafter as counsel may be heard, DL Thompson Law, PC, attorneys for **Automotive Finance Corporation**, the within creditor ("Creditor"), shall move before the **Honorable John K. Sherwood**, United States Bankruptcy Judge, at the United States Bankruptcy Court District of New Jersey (Newark), Martin Luther King, Jr. Federal Building, located at 50 Walnut Street Newark, NJ 07102 for an Order pursuant to 11 U.S.C. Section 362(d).

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying **Certification of Mark Branson, Risk Manager**. A proposed form of Order is also being submitted. A Memorandum of Law has not been submitted because the issues raised by the Motion are not extraordinary or unusual necessitating the filing of legal briefs.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) specify with particularity the basis of the objection; and (iii) be filed with the Clerk, United States Bankruptcy Court, District of New Jersey (Newark), Martin Luther King, Jr. Federal Building, located at 50 Walnut Street Newark, NJ 07102 and simultaneously served on Creditor's counsel, Donna L. Thompson, Esq., P.O. Box 679, Allenwood, New Jersey 08720, so as to be received no later than seven (7) days before the return date set forth herein.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that counsel hereby requests oral argument in accordance with D.N.J. LBR 9013-1 (f) in the event opposition papers are timely filed.

/s/ DONNA L. THOMPSON, ESQ.
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Dated: 11/14/2022